

EXHIBIT E

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Attorney for Relators
NYOKA JUNE LEE AND TALALA MSHUJA

U.S. DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA — WESTERN DIVISION

UNITED STATES OF AMERICA,
EX REL. NYOKA LEE and TALALA
MSHUJA,

Plaintiff,

v.

CORINTHIAN COLLEGES INC.,
et al.,

Defendants.

CASE NO. CV 07-01984 PSG (MANx)

**RELATOR NYOKA LEE'S OBJECTIONS
AND RESPONSES TO DEFENDANTS
CORINTHIAN COLLEGES INC., DAVID
MOORE AND JACK D. MASSIMINO'S
INTERROGATORIES TO RELATOR
NYOKA LEE - SET ONE, DATED
NOVEMBER 9, 2012 (7 ITEMS)**

Pursuant to Federal Rules of Civil Procedure 26 and 33, Relator Nyoka Lee submits the following Objections and Response to Defendants Corinthian

Colleges Inc., David Moore And Jack D. Massimino's Interrogatories To Relator Nyoka Lee - Set One, dated November 9, 2012 (7 items).

INTERROGATORIES

RESPONSE OF NYOKA LEE TO INTERROGATORY NO. 1-3:

OBJECTION:

Defendants request information that is privileged and exempt from discovery. All general objections and objections to instructions and definitions are incorporated herein by reference. These requests are not reasonably calculated to lead to the discovery of admissible evidence to the extent the requests call for, or reference, information and documents provided to the United States by Relators. Relators object to the request for production of the "Confidential & Privileged Disclosure Statement", and to all requests that reference information or documents "voluntarily provided to the United States", whether provided prior to, or after, the filing of the Original Complaint, and/or the Amended Complaint. The directions of 31 U.S.C. § 3730 require the production of certain information and documents to the United States. Relators object to the requests for production to the extent they are directed at the "written disclosure of substantially all material evidence and information the person possesses" provided to the United States, as required by statute. Relators also object to the production or identification of any sealed complaint or written materials submitted to the United States by Relator, including all material "filed in camera" and "under seal," pursuant to 31 U.S.C. § 3730(b)(2). Such complaints and materials are protected from identification and disclosure by sealing orders and/or as attorney work product, as confidential communications between parties with a common interest, and as materials developed in anticipation of litigation.

To the extent this request seeks information concerning any sealed filings or governmental or private investigation pertaining to possible qui tam litigation

or pending qui tam litigation, these request are also objectionable on the following grounds:

(a) such information is protected from disclosure pursuant to applicable federal seal requirements, court orders, and other laws, including but not limited to the Federal False Claims Act, 31, U.S.C. §§ 3729 - 3733;

(b) such information is protected from disclosure by the attorney-client and/or work-product privilege;

(c) such information is protected by the common interest privilege shared between Relator, plaintiff the United States, and States; and

(d) such information is protected by the governmental investigative and/or deliberative privileges.

These requests are also vague, ambiguous and overly broad in scope.

RESPONSE: Subject to the above objection, as well as the general objections and objections to Defendant's definitions and instructions, please see documents identified by bates numbers:

R 00001-00402; 403-789. Subject to "PRIVILEGE LOG"

Relators will not withhold otherwise non-privileged or protected documents responsive to requests for production, merely because such documents may have also been provided to the United States or any State by Relators. However, for the reasons stated above, Relators object to the production of documents in the form of its disclosures to the government or in a manner that will reveal its otherwise privileged or protected communications with the government. Relators are withholding documents which it believes are responsive to this request for the reasons stated herein.

1. IDENTIFY all DOCUMENTS and information, if any, that YOU voluntarily provided to the UNITED STATES prior to filing the ORIGINAL COMPLAINT.

RESPONSE: See above.

2. IDENTIFY all DOCUMENTS and information, if any, that YOU voluntarily provided to the UNITED STATES after filing the ORIGINAL COMPLAINT and before filing the AMENDED COMPLAINT.

RESPONSE: See above.

3. IDENTIFY all DOCUMENTS and information, if any, that YOU voluntarily provided to the UNITED STATES after filing the AMENDED COMPLAINT.

RESPONSE: See above.

4. IDENTIFY all dates on which YOU voluntarily provided DOCUMENTS or information to the UNITED STATES.

RESPONSE:

October 11, 2006

October 20, 2006

March 26, 2007

April 26, 2007

5. IDENTIFY all dates on which YOU provided the UNITED STATES the “Confidential & Privileged disclosure Statement” identified in section (ii) of RELATORS’ INITIAL DISCLOSURES.

RESPONSE:

April 26, 2007

6. IDENTIFY all dates on which YOU provided to the UNITED STATES the “402 pages of internal communications between Corinthian Colleges and Relator Nyoka Lee” identified in section (ii) of RELATORS’ INITIAL DISCLOSURES.

RESPONSE:

7. IDENTIFY the date on which YOU retained Scott Levy as YOUR lawyer in this action.

RESPONSE:

October 7, 2006

Respectfully submitted:

DATED: December 10, 2012 LEVY & ASSOCIATES PC

By: _____// SDL //_____

SCOTT D. LEVY
Attorney for Relators Nyoka June Lee
and Talala Mshuja